

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

WILLIAM J. WAGNER,

Plaintiff,

-vs-

CHIARI & ILECKI, LLP,

Defendant.

NOTICE OF MOTION
FOR LEAVE TO CITE
ADDITIONAL AUTHORITY

Docket No.: 1:15-cv-00633-FPG

MOTION BY:

Defendant, CHIARI & ILECKI, LLP, by their attorneys, CONNORS LLP.

DATE, TIME, AND
PLACE OF MOTION:

To be determined by the Honorable Frank P. Geraci, Jr., Chief United States District Judge, Western District of New York, 2 Niagara Square, Buffalo, New York.

Oral argument is requested (if motion is opposed).

SUPPORTING PAPERS:

Affidavit of Caitlin M. Higgins, Esq.; and all prior pleadings and proceedings.

RELIEF SOUGHT AND
GROUND FOR RELIEF:

An Order granting defendant leave to cite the case of *Hedayati v. Perry Law Firm*, SA CV 16-0846-DOC (DFMx), 2017 WL 4864491 (C.D. Cal. Oct. 27, 2017) as additional authority in support of Defendant's Opposition to Plaintiff's Motion for Summary Judgment and in Support of Defendant's Cross-Motion for Summary Judgment.

DATED: Buffalo, New York
May 1, 2018

s/Caitlin M. Higgins
Terrence M. Connors, Esq.
Caitlin M. Higgins, Esq.
CONNORS LLP
Attorneys for Defendant
Chiari &Ilecki, LLP
1000 Liberty Building
Buffalo, New York 14202
(716) 852-5533

TO: (via cm/ecf)
Kenneth R. Hiller, Esq.